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10 Attorneys for Defendant
11 RYAN WILSON

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 RYAN WILSON,
18 Defendant.

19 Case No. 1:21-cr-00315-NODJ-BAM
20 **STIPULATION TO CONTINUE
21 SENTENCING; ORDER**

22 Date: March 11, 2024
23 Time: 8:30 a.m.

24 IT IS HEREBY STIPULATED by and between the parties through their respective
25 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant
26 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the sentencing hearing
currently scheduled for February 20, 2024, at 8:30 a.m. may be continued to March 11, 2024, at
8:30 a.m.

27 Mr. Wilson entered a plea of guilty to Count One of the Indictment on October 10, 2023.
28 See Dkt. #44. The matter was then scheduled for sentencing on February 20, 2024. See Dkt. #44.
The draft Presentence Investigation Report (PSR) was filed on January 9, 2024, see Dkt. #46,
and the parties submitted informal objections on January 23, 2024. The final PSR was filed on
January 30, 2024. See Dkt. #47.

29 Undersigned counsel for Mr. Wilson is in the process of reviewing the most recent
30 changes made to the final version of the PSR filed on January 30, 2024. In order to provide

1 adequate time and opportunity for counsel to discuss the most recent changes to the PSR with
2 Mr. Wilson, counsel is requesting a brief continuance of the sentencing hearing in this case.
3 Additionally, counsel for Mr. Wilson requires additional time to obtain documents relevant for
4 sentencing and to be adequately prepared for sentencing. Accordingly, the parties are requesting
5 that sentencing hearing be continued in this matter from Tuesday, February 20, 2024, to Monday,
6 March 11, 2024.

7 The government does not oppose the continuance of the sentencing in this matter to the
8 date proposed herein. The requested continuance is made with the intention of conserving time
9 and resources for both the parties and the Court. The requested date is a mutually agreeable date
10 for all parties. As this is a sentencing hearing, no exclusion of time is necessary.

11
12 Respectfully submitted,

13 PHILLIP A. TALBERT
14 United States Attorney

15 Date: February 6, 2024

/s/ Kimberly Sanchez _____
16 KIMBERLY SANCHEZ
17 Assistant United States Attorney
Attorney for Plaintiff

18 HEATHER E. WILLIAMS
19 Federal Defender

20 Date: February 6, 2024

/s/ Reed Grantham _____
21 REED GRANTHAM
22 Assistant Federal Defender
23 Attorney for Defendant
RYAN WILSON

ORDER

IT IS SO ORDERED that the sentencing hearing is continued from February 20, 2024, to
March 11, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.

IT IS SO ORDERED.

Dated: February 6, 2024

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE